

Gerard P. Fox (SBN 151649)
gfox@gerardfoxlaw.com
Morgan E. Pietz (SBN 260629)
mpietz@gerardfoxlaw.com
GERARD FOX LAW, P.C.
1880 Century Park East, Suite 1410
Los Angeles, CA 90067
Telephone: (310) 441-0500
Facsimile : (310) 441-4447

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JUST GAMES INTERACTIVE
ENTERTAINMENT LLC,
d/b/a KUNG FU FACTORY, and
d/b/a TINY FUN STUDIOS,
a California limited liability company;

Plaintiff,

v.

GLU MOBILE INC., a Delaware
corporation; KRIS JENNER, f/k/a KRIS
KARDASHIAN, an individual; and
JOHN DOES 1 to 10;

Defendants.

Case No.: 2:15-cv-08626-PA-AGR_x

**PLAINTIFF'S NOTICE OF
VOLUNTARY DISMISSAL
WITHOUT PREJUDICE PURSUANT
TO FEDERAL RULE OF CIVIL
PROCEDURE 41(a)(1)**

Hon. Percy Anderson

Trial Date: Not Set

NOTICE OF VOLUNTARY DISMISSAL

1 **TO ALL PARTIES AND COUNSEL OF RECORD,**

2 **PLEASE TAKE NOTICE** that Plaintiff Just Games Interactive
3 Entertainment, LLC (“Plaintiff”), pursuant to Federal Rule of Civil Procedure
4 41(a)(1), hereby voluntarily dismisses all claims in this action *without prejudice* as
5 to all defendants.

6 Federal Rule of Civil Procedure 41(a)(1) provides, in relevant part:

7 **(a) Voluntary Dismissal.**

8 **(1) *By the Plaintiff.***

9 **(A) *Without a Court Order.*** Subject to Rules 23(e), 23.1(c), 23.3, and
10 66 and any applicable federal statute, the plaintiff may dismiss an
11 action without a court order by filing:

12 **(i)** a notice of dismissal before the opposing party serves either
13 an answer or a motion for summary judgment.

14 Defendants have neither filed an answer to Plaintiff’s Complaint, nor filed a
15 motion for summary judgment. Accordingly, this matter may be dismissed without
16 an Order of the Court.

17 The breach of implied contract claim is being concurrently refiled in the Los
18 Angeles Superior Court.

19 DATED: February 1, 2016

GERARD FOX LAW, P.C.

20 /s/ Gerard P. Fox

21
22 Gerard P. Fox
23 Morgan E. Pietz
24 *Attorneys for Plaintiff*
25 **JUST GAMES INTERACTIVE**
26 **ENTERTAINMENT LLC,**
27 *d/b/a KUNG FU FACTORY, and*
d/b/a TINY FUN STUDIOS, a California
limited liability company